

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

LISA BRUNSON,)	
)	
Plaintiff,)	Civil Action No. 3:20-cv-01056
)	
v.)	District Judge Eli J. Richardson
)	
CAPITOL CMG, INC., DAVID C COOK)	Magistrate Judge Alistair Newbern
d/b/a INTEGRITY MUSIC, and OSINACHI)	
KALU OKORO EGBU,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendants¹ respectfully move the Court to enter an order providing that any response in opposition to Plaintiff's Motion for Partial Summary Judgment shall be filed 28 days after the Court enters an order resolving Plaintiff's Motion for Leave to File Partial Motion for Summary Judgment ("Motion for Leave") (Doc. 204). Defendants' counsel has conferred with Plaintiff's counsel, and this motion is unopposed.

On December 9, 2024, Plaintiff filed the Motion for Leave. (Doc. 204). The same day, Plaintiff filed the Motion for Partial Summary Judgment as a standalone docket entry. (Doc. 205.) On December 23, 2024, Defendants filed a response in opposition to the Motion for Leave. (Doc. 209.) Plaintiff filed a reply. (Doc. 210.) The Motion for Leave is now fully briefed and pending before the Court.

Defendants file this motion out of an abundance of caution, and good cause justifies this request. The Court's last pertinent scheduling order provided that "[a]ny responses in opposition" to a dispositive motion "shall be filed 28 days after service of the motions." (Doc. 107 at 2.) Because Plaintiff filed the Motion for Leave, there is no deadline by which Defendants must respond to the Motion for Partial Summary Judgment.

Nonetheless, to promote clarity and to avoid any suggestion in the future that Defendants did not timely respond to Plaintiff's Motion for Partial Summary Judgment because that document was served on December 9, 2024, Defendants respectfully request that the Court enter an Order stating that any response in opposition to Plaintiff's Motion for Partial Summary Judgment shall be filed 28 days after the Court enters an order resolving Plaintiff's Motion for Leave.

¹ Defendants are Capitol CMG, Inc. ("CCMG"), David C Cook d/b/a Integrity Music ("Integrity" and, together with CCMG, "Publishers") and Osinachi Kalu Okoro Egbu ("Sinach").

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By: s/ Barry I. Slotnick

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via the Court's CM/ECF system upon:

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on this the 3rd of January, 2025.

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